

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Duane A. Rogers

Case No. 1-24-01727  
Chapter 13

**OBJECTION TO CONFIRMATION OF PLAN**

AND NOW, TO WIT, comes Meadowview Village Condominium Association, Inc., a creditor in this case (“Creditor”), and objects to confirmation of Debtor’s Plan for the following reasons:

1. The Plan provides for sale of the real estate at 145 Leonard Lane, Harrisburg (the “Property”).
2. The Plan further provides that post-petition amounts due on account of the Property will be paid as and when due.
3. Debtor has not paid all post-petition assessments due to Creditor such that he is already in default under the Plan prior to confirmation.
4. Debtor filed a Motion for Sale Free and Clear of the Property (Docket #9)(“Sale Motion”), with such sale to occur on/before September 5, 2024 (according to the Agreement of Sale attached as an exhibit to the Sale Motion.
5. Paragraph 7 of the Sale Motion provides for payment in full at closing of the amount due to Creditor.
6. As of the filing of this Motion, the property is still showing on County tax records as being owned by Debtor and no monies have been paid to Creditor as proceeds of sale.

WHEREFORE Creditor Meadowview Village Condominium Association, Inc. respectfully requests that this Court deny confirmation of Debtor's Plan, and for such other relief as may be just and proper.

AUSTIN LAW FIRM LLC

By: /s/ Sara A. Austin  
Sara A. Austin  
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Counsel for Creditor

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document filed in the above-captioned matter was or will be served on the following by ecf:

Gary Imblum, Esq.  
Debtor's counsel

Ch. 13 Trustee

/s/ Sara A. Austin \_\_\_\_\_  
Sara A. Austin, Esq.